

REMARKS

In the Office Action, claims 1-36 were rejected. Claims 2, 12, 17-21 were objected to as being dependent upon a rejected base claim, but were indicated as reciting allowable subject matter. Claims 1-36 are believed allowable for the reasons discussed below. Reconsideration and allowance of all pending claims are requested.

Rejections under 35 U.S.C. § 102(b)

Claims 1, 3-5, 13 and 15-16 are rejected under 35 U.S.C. § 102(b) as being anticipated by Iwanczyk (U.S. Patent 5,773,829, hereinafter "Iwanczyk"). Claims 1, 15 and 16 are independent.

Claim 1 recites a conversion device for use in an imaging system comprising a first perforated plate portion forming a plurality of collimator channels separated by a plurality of thin collimator walls, and a second perforated plate portion forming a plurality of scintillator channels separated by a plurality of thin scintillator walls. The device further includes a reflective coating applied to the inside scintillator surface of the plurality of thin scintillator walls, and a scintillator material *filling the plurality of scintillator channels*.

Claim 15 similarly recites a conversion device for use in an imaging system comprising a perforated plate forming a plurality of scintillator channels separated by a plurality of thin scintillator walls, and reflective coating applied to the inside scintillator surface of the plurality of thin scintillator walls. The conversion device further includes a scintillator material *filling the plurality of scintillator channels*.

Claim 16 recites a method of manufacturing a conversion device for use in an imaging system. The method includes perforating a plate element to form a plurality of scintillator channels separated by a plurality of thin scintillator walls, and coating an inside surface of the plurality of thin scintillator walls with a reflective coating. The

method further includes *filling the plurality of scintillator channels with a scintillator material*.

Applicants respectfully submit that Iwanczyk fails to disclose a scintillator material that fills a plurality of scintillator channels. Iwanczyk discloses an imaging detector that includes a collimator that is closely coupled with the scintillator. The scintillator comprises several scintillator segments. Specifically, Iwanczyk states that:

Each scintillator segment (e.g., 36A) is surrounded on its sides and its top by an optical reflector 60 *that is spaced from the segment by an air gap 62*. The optical reflector 60 reflects light (e.g., 40B, FIG. 1) back into the scintillator segment that produced it. Typically, the optical reflector 60 consists of an epoxy doped with titanium dioxide.

See, Iwanczyk, col. 8, lines 42-47 (emphasis added).

Clearly, there is an air gap present between the scintillator segment and the sides of the segment (*See*, e.g., Iwanczyk, FIG. 2, and column 3, lines 42-55). Consequently, Iwanczyk fails to disclose a scintillator material filling a plurality of scintillator channels as recited in Applicants' claims 1, 15 and 16.

Because Iwanczyk fails to disclose a scintillator material filling the plurality of scintillator channels, the reference cannot support a *prima facie* case of anticipation of claims 1, 15 and 16. Accordingly, Applicants respectfully submit that independent claims 1, 15 and 16, and claims depending therefrom are allowable, and respectfully request the Examiner to reconsider the rejection of the claims.

Rejections under 35 U.S.C. § 103(a)

The Office Action summarizes claims 6-11 and 14 as rejected under 35 U.S.C. §103(a) as unpatentable over Iwanczyk and in view of Warren (U.S. Patent 6,362,481, hereinafter "Warren").

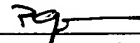
The claims rejected under this section all depend directly or indirectly from independent claim 1 discussed above. Warren does nothing to obviate the deficiencies of Iwanczyk, particularly regarding filling of scintillator channels with scintillator material. Consequently, all of the dependent claims are believed to be patentable both by virtue of their dependency from an allowable base claim, as well as for the subject matter they separately recite. Reconsideration and allowance of all of the dependent claims on this basis are requested.

Conclusion

In view of the remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

Date: 8/15/2005



Patrick S. Yoder
Reg. No. 37,479
FLETCHER YODER
P.O. Box 692289
Houston, TX 77269-2289
(281) 970-4545